

Buenwald, v.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. D/B/A UNILEVER,

Plaintiff,

v.

WELLS ENTERPRISES, INC.,

Defendant.

Case No.: 1:14-cv-02223-NRB-RLE

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WELLS ENTERPRISES, INC.,

Counterclaim Plaintiff,

v.

CONOPCO, INC. D/B/A UNILEVER,

Counterclaim Defendant.

STIPULATION TO EXTEND TIME

Plaintiff-Counterclaim Defendant Conopco, Inc. d/b/a Unilever ("Unilever"), and Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. ("Defendant") (hereinafter collectively, the "Parties"), stipulate and agree that all deadlines set forth in the Court's August 18, 2015 order (the "Order") shall be extended by 30 days, as follows:

Event	Current Deadline	Proposed Deadline
Initial expert reports due	September 21, 2015	October 21, 2015
Rebuttal expert reports due	October 26, 2015	November 25, 2015
Close of all fact discovery	November 27, 2015	December 28, 2015

Event	Current Deadline	Proposed Deadline
Close of all expert discovery	December 16, 2015	January 15, 2016 <i>NRB</i>
Last day to file case dispositive motions	December 30, 2015	January 29, 2016 <i>NRB</i>

This stipulation is the Parties' fourth request to extend the deadlines set forth in the case. Your Honor granted the Parties' previous requests to extend the case deadlines. The requested extension is not being sought for the purpose of delay, but so that the Parties can finalize the terms in their settlement agreement. Specifically, while the Parties have exchanged draft versions of a proposed settlement agreement, the parties require additional time to finalize a few of the terms in the agreement. Accordingly, the Parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's August 18, 2015 order be continued as set forth above. The Parties submit the enclosed proposed Revised Scheduling Order.

Vanessa Hew
 DUANE MORRIS LLP
 Gregory P. Gulia
 Vanessa C. Hew
 1540 Broadway
 New York, New York 10036-4086
 Telephone: (212) 692-1000
 Facsimile: (212) 692-1020
 E-mails: gpgulia@duanemorris.com
vchew@duanemorris.com

*Attorneys for Plaintiff-Counterclaim Defendant
 Conopco, Inc. d/b/a Unilever*

Natalie Hanlon-Leh
 Natalie Hanlon-Leh (*pro hac vice*)
 Wilmer Cutler Pickering Hale and Dorr LLP
 1255 17th Street, Suite 1660
 Denver, CO 80202
 E-mail: natalie.hanlonleh@wilmerhale.com

Edward Rosenthal
 Beth Ilana Goldman
 Nicole Bergstrom
 Frankfurt Kurnit Klein & Selz PC
 488 Madison Avenue
 New York, NY 10022
 Telephone: (212)-705-4817
 Fax: (212)-593-9175
 E-mails: erosenthal@fkks.com
bgoldman@fkks.com
nbergstrom@fkks.com

*Attorneys for Defendant-Counterclaim Plaintiff
 Wells Enterprises, Inc.*

SO ORDERED:

Samuel R. Korman
 U.S.D.J.

9/21/15 *NRB*